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July 31, 2024

The Honorable Kiyo Matsumoto
United States District Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Greebel, 15-CR-0637 (KAM)

Dear Judge Matsumoto:

With the consent of the United States, I write to respectfully request an extension of time, from August 2, 2024 to October 1, 2024, for the parties to submit their replies to the Mandate of the U.S. Court of Appeals Summary Order (the “Replies”). See Docket Entry dated May 30, 2024.

The parties have been engaging in good-faith efforts to resolve this matter without the need for further litigation, or at least to limit the scope of the issues. The parties have made progress but require additional time to complete these efforts. Specifically, the government recently made what it believes is its last and final offer, which Mr. Greebel needs time to consider. In any event, the government does not anticipate consenting to any further requests for an extension of the parties’ time to file their Replies. This request is therefore being made to allow the parties additional time necessary to resolve this matter on mutually agreeable terms.

This is the eighth request by either party for an extension of the deadline to submit their Replies. See ECF Nos. 789, 790, 791, 792, 795, 796, 797. The Court previously approved the seven prior requests, which collectively extended the parties’ deadline from July 14, 2023 until August 2, 2024. See Docket Entries dated July 13, 2023, August 15, 2023, September 25, 2023, November 30, 2023, February 8, 2024, April 1, 2024, May 30, 2024.

Respectfully,

/s/ Marc Aaron Takagaki

Marc Aaron Takagaki

Cc: All Counsel of Record (via ECF)